

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	
<b>ROBERT DALE HICKS</b>	:	<b>CASE NO. 1-13-05867-MDF</b>
<b>aka ROBERT D. HICKS</b>	:	
<b>Debtor</b>	:	<b>CHAPTER 13</b>
	:	
<b>M&amp;T BANK</b>	:	
<b>Movant</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>ROBERT DALE HICKS</b>	:	
<b>aka ROBERT D. HICKS</b>	:	
<b>Respondent</b>	:	

**DEBTOR'S RESPONSE TO MOTION OF**  
**M&T BANK**  
**FOR RELIEF FROM THE AUTOMATIC STAY**

**AND NOW**, comes Debtor, Robert Dale Hicks, by and through his attorney, Gary J. Imblum,  
and respectfully responds as follows:

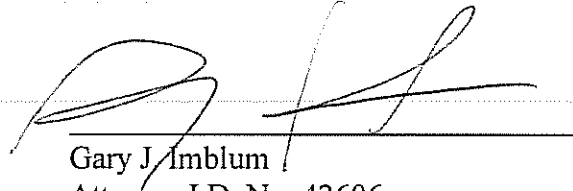
1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part, denied in part. The Mortgage and Assignment speak for themselves. Strict proof is demanded.
5. Admitted.
6. Admitted in part, denied in part. Client could not be contacted prior to the time of the filing of this response to verify arrearage. Strict proof is demanded.
7. Admitted in part, denied in part. See response to paragraph 6.
8. Admitted.

9. Admitted.

10. Denied. All fees and costs related to this action should be pled so that the Court may review same.

**WHEREFORE**, Debtor respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



Gary J. Imblum  
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Attorney for Debtor

DATED: 9/15/16

**CERTIFICATION OF SERVICE**

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTOR'S RESPONSE TO MOTION OF M&T BANK FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J DEHART III ESQUIRE  
CHAPTER 13 TRUSTEE  
VIA E-SERVICE

dehartstaff@pamd13trustee.com

JOSHUA I. GOLDMAN, ESQUIRE  
COUNSEL FOR MOVANT  
VIA E-SERVICE

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For Debtor

DATED: 9/15/16